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27 CRIM 708

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COUNT ONE

(Interstate Threats)

1. From at least in or about August 2021 up to and including about September 2021, in the Southern District of New York elsewhere, ENRIQUE FIGUEROA, the defendant, knowingly and intentionally transmitted in interstate and foreign commerce a communication containing a threat to kidnap and injure the person another, to wit, FIGUEROA posted on the Internet, and caused another person to post on the Internet, threats to kidnap, kill, injure the president of a foreign government ("Individual-1").

(Title 18, United States Code, Sections 875(c) and 2.)


COUNT TWO

(Threats Against a Foreign Official)

2. In or about September 2021, in the Southern District of New York and elsewhere, ENRIQUE FIGUEROA, the defendant, knowingly and willfully threatened to: (i) assault, strike, wound, imprison,

and offer violence to a foreign official and internationally protected person, make a violent attack upon the person and liberty of such person, and, under circumstances likely to endanger the person and liberty of such person, to make a violent attack upon the official premises, private accommodation, and means of transport of such person, in violation of Title 18, United States Code, Section 112(a); (ii) kill a foreign official and internationally protected person, in violation of Title 18, United States Code, Section 1116(a); and (iii) unlawfully seize, confine, inveigle, decoy, kidnap, abduct, and carry away and hold for ransom and reward or otherwise a foreign official and internationally protected person, in violation of Title 18, United States Code, Section 1201(a)(4), to wit, FIGUEROA posted on the Internet, and caused another person to post on the Internet, threats to kidnap, kill, and injure Individual-1, who was then in the United States.

(Title 18, United States Code, Sections 878(a) and 2.)


FOREPERSON


DAMIAN WILLIAMS
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ENRIQUE FIGUEROA,

Defendant.

INDICTMENT


21 Cr.

(18 U.S.C. §§ 875(c), 878(a) and 2.)

DAMIAN WILLIAMS

United States Attorney


Foreperson

Indictment filed before
OTW on 11/17/21


Whel A. J. Gardephe / OTW Nov. 17, 2021